



October 6, 2023

**Via ECF**

Hon. Edgardo Ramos  
United States District Court  
Southern District of New York  
40 Foley Square,  
New York, New York 10007

**Re: Laura Cuba v. Shadwick Inc., et al.**  
**Docket No.: 1:23-CV-05329 (ER)**

Dear Judge Ramos:

This firm represents Plaintiff Laura Cuba in the above-referenced matter brought against Defendants Shadwick Inc. d/b/a The Bravest, and Michael F. Shadwick ("Defendants"), for alleged violations of the Fair Labor Standards Act and the New York Labor Law. We write, with Defendants' consent, to request a thirty-day extension to the deadline for Plaintiff to file her motion for settlement approval. The parties are close to finalizing the specific terms of the settlement agreement so that same may be executed and filed along with Plaintiff's motion for settlement approval. Additionally, Defendants are currently out of the country, and will not return until near the end of October. Therefore, out of an abundance of caution, the parties request that the Court extend the deadline for Plaintiff to file her motion for settlement approval by thirty days, from October 9, 2023, to November 8, 2023. This is the first request for an extension of time to file the Plaintiff's motion for settlement approval, and will not impact any other deadlines in this matter.

We thank the Court for its time and consideration. Please let us know if Your Honor needs any further information.

Respectfully,

**/s Matthew J. Farnworth**  
**MATTHEW J. FARNWORTH**

cc: All counsel of record

**MEMO ENDORSED**

The request is granted. Plaintiff shall file her motion for settlement approval by November 8, 2023. SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: October 9, 2023

New York, New York